

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

1. *Please complete a separate form for each issue.*
2. *Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
3. *Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
4. *Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

Submitted by: *MCI Entities*

Contact: Counsel for MCI: *Deborah Kuhn/Niles Berman*
Telephone Number: *(312) 260-3326/(608) 441-3824*
e-mail: *deborah.kuhn@mci.com/nberman@wheelerlaw.com*

Subject Matter Expert (SME): *Jeffrey Quinn/Sherry Lichtenberg*
Telephone Number: *(312) 260-3445/(202) 736-6580*
e-mail: *jeffrey.quinn@mci.com/sherry.lichtenberg@mci.com*

Authorized Representative: *Contact Counsel*
Telephone Number:
e-mail:

Name: **IDENTIFICATION OF BUSINESS RULES ASSOCIATED WITH
USOCS/RATES**

Brief Description: **Require SBC to identify the Business Rules associated with each
USOC and rate billed in Wisconsin**

Please answer the following questions:

1. When this issue was first discovered? MCI began requesting that SBC provide

- this information approximately six months ago during Michigan 271 proceedings.
2. How many occurrences and approximately over how long a period of time? N/A
 3. Is it a recurring problem? N/A
 4. Your belief as to the cause of the problem. N/A
 5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. N/A
 6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High
 7. Any other pertinent information? Requiring SBC to identify the Business Rules associated with each USOC and rate billed in Wisconsin will assist CLECs in auditing SBC's wholesale bills and filing disputes.

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? See #1 above
2. Was this issue escalated for dispute resolution? If so, when and in what forum? N/A
3. Last known position of the opposing carrier. SBC has not provided the requested information, despite repeated requests.
4. Were any bill adjustments made to resolve this issue? N/A
5. Were any policies or procedures changed to address this issue? If so, what changes were made? N/A

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Require SBC to identify the Business Rules associated with each USOC and rate appearing on CLEC bills in Wisconsin

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.

5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

1. *Please complete a separate form for each issue.*
2. *Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
3. *Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
4. *Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

Submitted by: *MCI Entities*

Contact: Counsel for MCI: *Deborah Kuhn/Niles Berman*
Telephone Number: *(312) 260-3326/(608) 441-3824*
e-mail: *deborah.kuhn@mci.com/nberman@wheelerlaw.com*

Subject Matter Expert (SME): *Jeffrey Quinn/Sherry Lichtenberg*
Telephone Number: *(312) 260-3445/(202) 736-6580*
e-mail: *jeffrey.quinn@mci.com/sherry.lichtenberg@mci.com*

Authorized Representative: *Contact Counsel*
Telephone Number:
e-mail:

**Name: IDENTIFICATION OF SUPPORT FOR BUSINESS RULES
ASSOCIATED WITH USOCS/RATES**

Brief Description: Require SBC to identify the cost studies, Commission orders, arbitration awards, etc. that support SBC's Business Rules

Please answer the following questions:

1. When this issue was first discovered? MCI began requesting that SBC provide

- this information approximately six months ago during Michigan 271 proceedings
2. How many occurrences and approximately over how long a period of time? N/A
 3. Is it a recurring problem? N/A
 4. Your belief as to the cause of the problem. SBC has not yet developed or applied consistent rules for applying its business rules to wholesale bills
 5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. N/A
 6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High
 7. Any other pertinent information? This will allow MCI (and other CLECs) to assess the underlying validity of SBC's business rules associated with each USOC. MCI is concerned that there are instances in which SBC is following its Business Rules, but they are unjustified.

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? See #1 above
2. Was this issue escalated for dispute resolution? If so, when and in what forum? N/A
3. Last known position of the opposing carrier. SBC has not yet developed or applied consistent rules for applying its business rules to wholesale bills
4. Were any bill adjustments made to resolve this issue? N/A
5. Were any policies or procedures changed to address this issue? If so, what changes were made? N/A

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Require SBC to identify the cost studies, Commission orders, arbitration awards, etc. that support the Business Rules associated with each USOC and rate appearing on CLEC bills in Wisconsin

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?

3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

Submitted by: MCI Entities

Contact: Counsel for MCI: Deborah Kuhn/Niles Berman
Telephone Number: (312) 260-3326/(608) 441-3824
e-mail: deborah.kuhn@mci.com/nberman@wheelerlaw.com

Subject Matter Expert (SME): Jeffrey Quinn/Sherry Lichtenberg
Telephone Number: (312) 260-3445/(202) 736-6580
e-mail: jeffrey.quinn@mci.com/sherry.lichtenberg@mci.com

Authorized Representative: Contact Counsel
Telephone Number:
e-mail:

Name: IDENTIFICATION OF USOCS APPLICABLE TO SBC'S TARIFFED RATES/ICA RATES

Brief Description: Require SBC to include USOCs in its Wisconsin tariffs for every tariffed wholesale rate; standardize the descriptions of products and services found in SBC's tariffs and ICAs; provide USOC reference guides to ICAs

Please answer the following questions:

1. When this issue was first discovered? N/A
2. How many occurrences and approximately over how long a period of time?
USOCs have never been included in SBC's tariffs, although SBC has recently published USOC Reference Guides for its Wisconsin tariffs at <https://clec.sbc.com/clec/shell.cfm?section=1503#WISCONSIN>
3. Is it a recurring problem? N/A
4. Your belief as to the cause of the problem. N/A
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. N/A
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High
7. Any other pertinent information? Assisting CLECs in connecting SBC's tariffed/ICA rates to the USOCs appearing on SBC's wholesale bills will allow MCI (and other CLECs) to audit those bills more usefully. Now that SBC has provided USOC Reference Guides to its Wisconsin wholesale tariffs, it is easier to match the USOCs that appear on CLEC bills with the rates in SBC's tariffs (and it would therefore appear possible for SBC to now include these USOCs in its filed tariffs). However, it is still difficult to match the descriptions of products and services in SBC's tariffs with those in MCI's interconnection agreement, and a similar USOC reference guide to ICA products and services would be extremely helpful.

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Since MCI's entry into the local market in Michigan and Illinois in 2001. This was also raised in the 271 proceedings.
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
N/A
3. Last known position of the opposing carrier. While SBC has not incorporated USOCs into its filed tariffs, it has now posted Wisconsin USOC Reference Guides on its CLEC On-Line website at <https://clec.sbc.com/clec/shell.cfm?section=1503#WISCONSIN>.
4. Were any bill adjustments made to resolve this issue? N/A
5. Were any policies or procedures changed to address this issue? If so, what changes were made? Yes – see Par. 3 above.

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

(1) Require SBC to update its Commission-filed tariffs to include USOCs (rather than simply providing informal USOC reference guides that may not be timely updated); (2) standardize the service and product descriptions in SBC's tariffs and interconnection agreements; (3) provide USOC reference guides to ICA products and services that do not match the service and product descriptions in SBC's tariffs.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

T:\dockets\ti\SBC wholesale billing docket template.doc

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

Submitted by: *MCI Entities*

Contact: Counsel for MCI: *Deborah Kuhn/Niles Berman*
Telephone Number: (312) 260-3326/(608) 441-3824
e-mail: deborah.kuhn@mci.com/nberman@wheelerlaw.com

Subject Matter Expert (SME): *Jeffrey Quinn/Sherry Lichtenberg*
Telephone Number: (312) 260-3445/(202) 736-6580
e-mail: jeffrey.quinn@mci.com/sherry.lichtenberg@mci.com

Authorized Representative: *Contact Counsel*
Telephone Number:
e-mail:

Name: **SBC BILLING ACCURACY PLAN**

Brief Description: Require SBC to develop and implement a Billing Accuracy Plan that includes a component addressing the timely updating and accurate maintenance of its rate tables

Please answer the following questions:

1. When this issue was first discovered? N/A

2. How many occurrences and approximately over how long a period of time? N/A
3. Is it a recurring problem? N/A
4. Your belief as to the cause of the problem. SBC does not have an automated or documented method for updating its rate tables to include the most timely and accurate data. In addition, errors in other databases, such as ACIS, cause out-of-synch conditions that result in inaccurate CLEC billing.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. N/A
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: Medium
7. Any other pertinent information? This will reduce the number of errors in SBC's wholesale bills, thereby preserving MCI's (and other CLECs') auditing resources. As addressed in the 271 docket, many wholesale billing errors result from SBC's failure to maintain its rate tables adequately.

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes, during the proceedings in PSCW Docket 6720-TI-170.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? No.
3. Last known position of the opposing carrier. SBC believes its Billing Auditability Plan is sufficient and has refused to implement and Billing Accuracy Plan, claiming that its bills are accurate.
4. Were any bill adjustments made to resolve this issue? N/A
5. Were any policies or procedures changed to address this issue? If so, what changes were made? No.

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Require SBC to develop and implement a Billing Accuracy Plan that includes a component addressing the timely updating and accurate maintenance of its rate tables

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.

2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

1. *Please complete a separate form for each issue.*
2. *Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
3. *Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
4. *Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

Submitted by: *MCI Entities*

Contact: Counsel for MCI: *Deborah Kuhn/Niles Berman*
Telephone Number: *(312) 260-3326/(608) 441-3824*
e-mail: *deborah.kuhn@mci.com/nberman@wheelerlaw.com*

Subject Matter Expert (SME): *Jeffrey Quinn/Sherry Lichtenberg*
Telephone Number: *(312) 260-3445/(202) 736-6580*
e-mail: *jeffrey.quinn@mci.com/sherry.lichtenberg@mci.com*

Authorized Representative: *Contact Counsel*
Telephone Number:
e-mail:

Name: CONFIRMATION OF SUMMARY FORMAT FOR SBC DISPUTE RESOLUTION

Brief Description: Confirm that MCI can raise systemic billing disputes without submitting detailed lists of all affected TNs

Please answer the following questions:

1. When this issue was first discovered? N/A

2. How many occurrences and approximately over how long a period of time? N/A
3. Is it a recurring problem? N/A
4. Your belief as to the cause of the problem. N/A
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. N/A
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: Low
7. Any other pertinent information? SBC's current dispute resolution processes generally require MCI to submit a list of impacted TNs. When there are only a few TNs at issue, this is not a problem. When there is a global problem – for example, billing MCI for a USOC inapplicable to UNE-P service, thereby impacting thousands of TNs, this requirement is onerous and unnecessary. SBC used to reject any dispute submitted without a list of affected TNs, although it seems to have retreated from this position. MCI would like confirmation that SBC will continue to follow this revised approach.

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? N/A
2. Was this issue escalated for dispute resolution? If so, when and in what forum? N/A
3. Last known position of the opposing carrier. N/A
4. Were any bill adjustments made to resolve this issue? N/A
5. Were any policies or procedures changed to address this issue? If so, what changes were made? N/A

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Confirm that MCI can raise systemic billing disputes without submitting detailed lists of all affected TNs without SBC rejecting the dispute.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please

attach any relevant accessible letter(s).

4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

Submitted by: *MCI Entities*

Contact: Counsel for MCI: *Deborah Kuhn/Niles Berman*
Telephone Number: (312) 260-3326/(608) 441-3824
e-mail: deborah.kuhn@mci.com/nberman@wheelerlaw.com

Subject Matter Expert (SME): *Jeffrey Quinn/Sherry Lichtenberg*
Telephone Number: (312) 260-3445/(202) 736-6580
e-mail: jeffrey.quinn@mci.com/sherry.lichtenberg@mci.com

Authorized Representative: *Contact Counsel*
Telephone Number:
e-mail:

Name: **IMPROVE CONSISTENCY OF SBC'S BILLING DISPUTE
RESOLUTION PROCESSES**

Brief Description: Requiring SBC to improve the consistency of its processes for handling and coding wholesale billing disputes and dispute resolution credits

Please answer the following questions:

1. When this issue was first discovered? N/A

2. How many occurrences and approximately over how long a period of time? N/A
3. Is it a recurring problem? N/A
4. Your belief as to the cause of the problem. N/A
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. N/A
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: Medium
7. Any other pertinent information? After submitting a billing dispute, MCI often receives multiple, conflicting responses from various individuals at SBC, both in their coding of the dispute and in their substantive response thereto. This complicates the dispute resolution process and results in inconsistent application of bill credits in resolving disputes.

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? N/A
2. Was this issue escalated for dispute resolution? If so, when and in what forum? N/A
3. Last known position of the opposing carrier. N/A
4. Were any bill adjustments made to resolve this issue? N/A
5. Were any policies or procedures changed to address this issue? If so, what changes were made? N/A

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Require SBC to improve the consistency of its processes for handling and coding wholesale billing disputes and dispute resolution credits to reduce the incidence of CLECs receiving multiple conflicting responses from various representatives of SBC

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.

5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

1. *Please complete a separate form for each issue.*
2. *Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
3. *Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
4. *Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

Submitted by: **MCI Entities**

Contact: Counsel for MCI: **Deborah Kuhn/Niles Berman**
Telephone Number: (312) 260-3326/(608) 441-3824
e-mail: deborah.kuhn@mci.com/nberman@wheelerlaw.com

Subject Matter Expert (SME): **Jeffrey Quinn/Sherry Lichtenberg**
Telephone Number: (312) 260-3445/(202) 736-6580
e-mail: jeffrey.quinn@mci.com/sherry.lichtenberg@mci.com

Authorized Representative: **Contact Counsel**
Telephone Number:
e-mail:

Name: **BILLING CLECS FOR LINES NOT THEIRS**

Brief Description: SBC has continued to bill CLECs for lines that do not belong to the CLECs being billed, or at least for which SBC has transmitted line loss notifications to CLECs

Please answer the following questions:

1. When this issue was first discovered? Shortly after MCI's launch of local service

in Michigan and Illinois in 2001; problem has continued since Wisconsin launch in March 2002

2. How many occurrences and approximately over how long a period of time? MCI audits SBC's lines-in-service report on a quarterly basis. This report purports to show the lines for which SBC is billing MCI. The lines are compiled from the ACIS database and appear to be based on provisioning records. Audits in March 2003 and July 2003 show that these records continue to be incorrect when compared to MCI's data. In addition, lines shown on the lines-in-service report do not match the lines for which MCI receives CABS bills.
3. Is it a recurring problem? Yes.
4. Your belief as to the cause of the problem. SBC failure to keep accurate records of lines owned by CLECs, coupled with SBC's transmission of erroneous line loss notifications. Manual handling in the SBC local service centers ("LSCs") and lack of review of the ACIS database appear to be additional contributors to this problem.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. No.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High
7. Any other pertinent information? MCI has raised this issue extensively in 271 proceedings throughout the region and was recognized by DOJ on July 16th as a continuing impediment to its support of SBC Michigan's pending 271 application.

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes, in various performance measurement collaboratives, 271 filings, and business to business meetings. MCI believes that the majority of CLECs have raised this issue with SBC.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? MCI continues to discuss this issue on a business to business basis.
3. Last known position of the opposing carrier. SBC believes that this is a "normal" problem given the volume of customers to whom service is provisioned. SBC maintains that the problem is small and that there are no longer systemic problems with line loss notifications.
4. Were any bill adjustments made to resolve this issue? They will be, but the credit amounts are in question.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? SBC has been reluctant to admit the problem, much less fix it.

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Require SBC to undertake a line reconciliation project for Wisconsin, at no cost to CLECs, to resolve the continuing inaccuracies in its records. Require SBC to improve its

line loss notification processes and reduce the level of manual involvement in those processes to reduce the incidence of the transmission of erroneous line loss notifications. Require SBC to meet with CLECs to describe the process used to update data in ACIS. Require SBC to make E&Y available for discussions regarding any work it has done to ensure that data in the ACIS database is correct and that data is correctly transmitted to the CABS database. Require SBC to issue CLECs their due and owing credits plus require interest for erroneous charges.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

T:\dockets\ti\SBC wholesale billing docket template.doc

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

- 1. Please complete a separate form for each issue.*
- 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
- 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
- 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

Submitted by: *MCI Entities*

Contact: Counsel for MCI: *Deborah Kuhn/Niles Berman*
Telephone Number: *(312) 260-3326/(608) 441-3824*
e-mail: *deborah.kuhn@mci.com/nberman@wheelerlaw.com*

Subject Matter Expert (SME): *Jeffrey Quinn/Sherry Lichtenberg*
Telephone Number: *(312) 260-3445/(202) 736-6580*
e-mail: *jeffrey.quinn@mci.com/sherry.lichtenberg@mci.com*

Authorized Representative: *Contact Counsel*
Telephone Number:
e-mail:

Name: **CABS RECONCILIATION**

Brief Description: Although SBC has conceded that it overbilled CLECs as a result of errors ostensibly caused by its migration to CABS billing in October 2002, the amount at issue still remains in dispute as to lines for which SBC used a proxy to determine the original installation date

Please answer the following questions:

1. When this issue was first discovered? Late 2002
2. How many occurrences and approximately over how long a period of time? N/A
3. Is it a recurring problem? The reconciliation itself is not, but the erroneous CABS bills are.
4. Your belief as to the cause of the problem. SBC failure to keep accurate records of lines owned by CLECs, coupled with SBC's transmission of erroneous line loss notifications; manual handling errors
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. No.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: Low
7. Any other pertinent information? This has been raised by MCI extensively in 271 proceedings throughout the region and was recognized by DOJ on July 16th as a continuing impediment to its support of SBC Michigan's pending 271 application.

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes, in various 271 filings and business to business meetings.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? Not yet.
3. Last known position of the opposing carrier. SBC believes this is a one-time problem that will be easily resolved.
4. Were any bill adjustments made to resolve this issue? The dispute involves credit amounts
5. Were any policies or procedures changed to address this issue? If so, what changes were made? N/A

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Require SBC to establish a team of knowledgeable personnel to work with affected CLECs to explain in detail its reconciliation process and provide satisfactory confirmation that all billing issues arising out of the CABS reconciliation have been resolved, including those as to lines for which SBC used a proxy to determine the original installation date. Require SBC to issue CLECs their due and owing credits plus required interest.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system

operation?

4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

- 1. Please complete a separate form for each issue.*
- 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
- 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
- 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

Submitted by: *MCI Entities*

Contact: Counsel for MCI: *Deborah Kuhn/Niles Berman*
Telephone Number: *(312) 260-3326/(608) 441-3824*
e-mail: *deborah.kuhn@mci.com/nberman@wheelerlaw.com*

Subject Matter Expert (SME): *Jeffrey Quinn/Sherry Lichtenberg*
Telephone Number: *(312) 260-3445/(202) 736-6580*
e-mail: *jeffrey.quinn@mci.com/sherry.lichtenberg@mci.com*

Authorized Representative: *Contact Counsel*
Telephone Number:
e-mail:

Name: **ERRONEOUS NRCs**

Brief Description: **SBC has not responded adequately to CLECs' questions regarding non-recurring charges ("NRCs") and usage charges appearing erroneously on CLECs' UNE-P bills**

Please answer the following questions:

1. When this issue was first discovered? It is an ongoing problem, but was

highlighted in 271 proceedings throughout the region

2. How many occurrences and approximately over how long a period of time? It has been a consistent problem with MCI's UNE-P bills since it entered the local market in March 2002.
3. Is it a recurring problem? Yes.
4. Your belief as to the cause of the problem. SBC's failure to maintain accurate rate tables and the extensive use of manual intervention in the ordering process.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. No.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High
7. Any other pertinent information? SBC has been charging USOCs SEPUP and SEPUC on residential UNE-P migration orders, even though these USOCs are inapplicable to migration orders (and SEPUP is applicable only to business lines). SBC has estimated that 95% of its SEPUP charges to CLECs are incorrect, and 80% of its SEPUC charges to CLECs are incorrect. SBC has also been charging CLECs for truck rolls (USOC VIN) on UNE-P orders even though truck roll charges do not apply to UNE-P. SBC also cannot explain why we are billed for different numbers of loop, cross connect, and switch ports each month.

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes, in various 271 filings and business to business meetings, as well as billing disputes.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? Not yet.
3. Last known position of the opposing carrier. SBC seems to concede that the vast majority of these charges are inaccurate.
4. Were any bill adjustments made to resolve this issue? Not yet.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? No.

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Require SBC to undertake an audit and revision of its rate tables to ensure that USOCs inapplicable to residential UNE-P service do not continue to appear on wholesale bills. Require SBC to issue CLECs their due and owing credits plus required interest. See also relief sought in MCI templates regarding USOCs and business rules.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or

tariff? If so, please explain.

3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-XXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-XXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-XXX-XXXX*

e-mail:

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

1. *Please complete a separate form for each issue.*
2. *Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
3. *Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
4. *Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

Submitted by: *MCI Entities*

Contact: Counsel for MCI: *Deborah Kuhn/Niles Berman*
Telephone Number: *(312) 260-3326/(608) 441-3824*
e-mail: *deborah.kuhn@mci.com/nberman@wheelerlaw.com*

Subject Matter Expert (SME): *Jeffrey Quinn/Sherry Lichtenberg*
Telephone Number: *(312) 260-3445/(202) 736-6580*
e-mail: *jeffrey.quinn@mci.com/sherry.lichtenberg@mci.com*

Authorized Representative: *Contact Counsel*
Telephone Number:
e-mail:

Name: **MANUAL ERROR**

Brief Description: **SBC should present a proposal to rectify the billing problems that it has repeatedly blamed on manual error**

Please answer the following questions:

1. When this issue was first discovered? When MCI entered the local market in Michigan and Illinois in 2001; problem has continued since Wisconsin entry in

March 2002

2. How many occurrences and approximately over how long a period of time?
Repeated issue since SBC began issuing MCI wholesale bills
3. Is it a recurring problem? Yes
4. Your belief as to the cause of the problem. N/A
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. N/A
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: Medium
7. Any other pertinent information? No matter how much work SBC does on its OSS, the continued inclusion of manual processes in the wholesale billing process guarantees the continued incidence of manual error.

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? PM Collaboratives, 271 filings and business-to-business meetings.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? N/A
3. Last known position of the opposing carrier. SBC downplays the importance of manual error in its billing systems.
4. Were any bill adjustments made to resolve this issue? N/A
5. Were any policies or procedures changed to address this issue? If so, what changes were made? N/A

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Require SBC to develop a plan to rectify the billing concerns it attributes to manual error, and reduce the use of manual handling.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).

4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

Submitted by: **MCI Entities**

Contact: Counsel for MCI: **Deborah Kuhn/Niles Berman**
Telephone Number: (312) 260-3326/(608) 441-3824
e-mail: deborah.kuhn@mci.com/nberman@wheelerlaw.com

Subject Matter Expert (SME): **Jeffrey Quinn/Sherry Lichtenberg**
Telephone Number: (312) 260-3445/(202) 736-6580
e-mail: jeffrey.quinn@mci.com/sherry.lichtenberg@mci.com

Authorized Representative: **Contact Counsel**
Telephone Number:
e-mail:

Name: 6720-TI-161 TRUE-UP

Brief Description: The Commission should not close the issues list for this proceeding until the true-up process for Docket No. 6720-TI-161 is substantially underway, since it is likely to raise presently unknown billing problems.

Please answer the following questions:

1. When this issue was first discovered? N/A

2. How many occurrences and approximately over how long a period of time? N/A
3. Is it a recurring problem? N/A
4. Your belief as to the cause of the problem. N/A
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. N/A
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High
7. Any other pertinent information?

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? N/A
2. Was this issue escalated for dispute resolution? If so, when and in what forum? N/A
3. Last known position of the opposing carrier. N/A
4. Were any bill adjustments made to resolve this issue? N/A
5. Were any policies or procedures changed to address this issue? If so, what changes were made? N/A

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Decline to close the issues list for this proceeding until the true-up process for Docket No. 6720-TI-161 is substantially underway, since it is likely to raise presently unknown billing problems.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).

7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail: